



FW: In-Trench Treatment

Conaway, Kathy (ECY)

to:

Dave Bartus

06/05/2007 01:01 PM

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From: "Conaway, Kathy (ECY)" <KCON461@ECY.WA.GOV>

To: Dave Bartus/R10/USEPA/US@EPA,

History: This message has been replied to.

I don't know if I sent this to you from Michelle pushing her DW knowledge on all of us. She has now developed a reputation in our section for sticking her nose into things that she doesn't need to or it is outside her knowledge zone. We don't know why she does it either. I say that she is not given enough engineer work to keep her busy.

From: Mandis, Michelle (ECY)

Sent: Thursday, May 31, 2007 11:04 AM

To: Conaway, Kathy (ECY)

Cc: Van Mason, Eric (ECY); Ollero, Jennifer (ECY); Szendre, Steve (ECY); Davis, Greta (ECY); Singleton, Deborah (ECY); Szendre, Steve (ECY); Skinnerland, Ron (ECY)

Subject: RE: In-Trench Treatment

Kathy~

Thank you for your two-cent's worth...all good thoughts!

Basically the LLBG permit and associated documents do not yet included information, procedures, conditions, etc. for In trench treatment. Jennifer and Deborah are well aware of this and will be working through those issues.

Basically, DOE/FH approached us in February with the idea of In trench treatment for large boxes to meet an M-91 Milestone. As this has never been performed for such large boxes of this nature of waste type...Ecology needs more information before any decision can be made and the permitting documentation is begun. (Thus the questions associated with how they plan to do this effort...)

Eric and I have briefly looked at the definitions for debris and hazardous debris. What we noted is that approximately 49% of the waste within the container that is slated for in trench treatment must actually be debris and no mixing or dilution is allowed. Thus my question concerning visual inspections and verification of the waste containers (please note that these are very, very large boxes, several of which were packaged in 1982, prior to many of our current operating standards and regulations!)

I understand that LDR regs./definitions do not total prohibit filter cake and sludges...however one must apply for a "variance" and that is an extra step in the process that I wanted to get out in the open as we began this process. I want FH/DOE to know that this is a prohibited item as is.

All of the comments/questions I listed resulted from a large discussion at the LLBG PMM (held before your arrival for the Liquids PMM) where this background information was presented by USDOE and FH. We might almost be looking at a "treatability study", but I am not sure anyone really wants to go down that pathway.

Thank you though for your clarification about the LDR "statutes" and applicability of MTCA regs....obviously I am not a permit writer or regulatory specialist! (Deborah, Jennifer...hope I did not mess things up too badly!)

Michelle

From: Conaway, Kathy (ECY)

Sent: Wednesday, May 30, 2007 5:17 PM

To: Mandis, Michelle (ECY)
Cc: Van Mason, Eric (ECY); Ollero, Jennifer (ECY); Szendre, Steve (ECY); Davis, Greta (ECY); Singleton, Deborah (ECY)
Subject: In-Trench Treatment

I suppose that I was cc on your email because of PMM-not sure and I can't help adding my 2 cents concerning the list of questions from Ecology. First, why are we asking DOE what they plan to do? We should provide the direction according to permit conditions and WAC-173-303. If there are no permit conditions, shame on us. Second, I think that we need to look at the LDR definitions, particularly *debris* and *hazardous debris* instead of asking DOE about verification. Question #3 should be Ecology asking what does their WAP say? Question #4 Ecology again, should be asking itself what are the debris rule standards instead of asking DOE what treatment standards....? Question #6 isn't very clear and MTCA regulations do not apply to Hanford's dangerous waste permit. The WAC 173-303 dangerous waste rules of (WAC-610 and 640) do apply to Hanford and closure requirements can impose clean-up levels according to MCTA methods. Question #7 is also unclear and I think you mean to say LDR regulations-there are no LDR statutes and the LDR regs and definitions as written do not totally prohibit filter cake and sludges. We need to be careful and accurate in our messages to DOE.

Kathy Conaway
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